

STATUS REPORT

Re: *United States v. El-Hanafi, et al.*,
S4 10 Cr. 162(KMW)

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November 19, 2010

BY FACSIMILE [(212) 805-7900]

The Honorable Kimba M. Wood
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Hasanoff*,
S4 10 Cr. 162(KMW)

Dear Judge Wood:

This letter is submitted in connection with the above-entitled case, in which I (along with David A. Ruhnke, Esq., and Anthony L. Ricco, Esq.) represent defendant Sabirhan Hasanoff. As a result of a meeting between defense counsel and the government this past Wednesday, and in advance of the next pretrial conference, scheduled for Tuesday, November 23, 2010, at 11 a.m., all parties jointly propose the following motion schedule for the Court's approval:

Defendants' Discovery and Bill of Particulars Motions: due January 17, 2011

Government's Response: due January 31, 2011

Defendants' Reply: due February 7, 2011

Defendants' additional, substantive motions would be due two weeks after production of any additional discovery and/or Bill of Particulars ordered by the Court in response to defendants' motions. If the Court should deny all requested relief regarding discovery and/or a Bill or Particulars, the substantive motions would be due 30 days after the Court's decision. We

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also leave to the Court's determination a particular return date (and pretrial conference) for the discovery motions, which can be set at next Tuesday's pretrial conference.

The proposed schedule set forth above does not include motions related to classified discovery and/or issues related thereto, which motions will be submitted separately and soon as practicable in the course of defense counsel's ongoing review of classified discovery (that the government continues to produce).

Accordingly, it is respectfully requested that the Court approve this motion schedule either by endorsement or at Tuesday's pretrial conference.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Joshua L. Dratel", written in a cursive style.

Joshua L. Dratel

JLD/rd

cc: Brendan R. McGuire
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